Peter Eidenberg, OSB #075778 peidenberg@keatingjones.com Kelly F. Huedepohl, OSB #133896 khuedepohl@keatingjones.com Keating Jones Hughes PC One SW Columbia, Suite 800 Portland, OR 97258-2095

Phone: (503) 222-9955 Fax: (503) 796-0699

Of Attorneys for Patenaude & Felix, A.P.C.

UNITED STATES DISTRICT COURT DISTRICT OF OREGON PORTLAND DIVISION

BRIAN CARLOS, on behalf of himself and all other similarly situated,

Case No. 3:14-cy-00921-MO

Plaintiff,

DEFENDANT'S UNOPPOSED MOTION TO EXTEND TIME IN WHICH TO RESPOND TO PLAINTIFF'S MOTION FOR ATTORNEYS FEES

v.

PATENAUDE & FELIX, A.P.C.,

Defendant.

Defense counsel conferred with plaintiff's counsel on December 23, 2015, and plaintiff does not oppose this motion.

Motion

Defendant Patenaude & Felix moves the Court for an order pursuant to Fed. R. Civ. P. 6(b)(1) enlarging the time within which it may respond to plaintiff's motion for attorney fees. Defendant seeks an additional eight days in which to respond. The current deadline to respond is December 28, 2015. If granted, defendant's response will be due January 5, 2016.

//

DEFENDANTS' MOTION FOR EXTENSION OF TIEM TO RESPOND TO PLAINTIFF'S MOTION FOR ATTORNEYS FEES

KEATING JONES HUGHES P.C. One Southwest Columbia, Suite 800 Portland, Oregon 97258-2095 (503) 222-9955

- Page 1

This motion is brought in good faith with the extension being requested in light of the intervening holidays. This motion is not made for any improper purpose. Defendant is not aware of any prejudice to any party that will result if its motion is granted.

WHEREFORE, defendant requests the Court extend the deadline for its response to plaintiff's motion for attorney fees by eight days, and set a new deadline of January 5, 2016.

DATED this 23rd day of December, 2015.

KEATING JONES HUGHES, P.C.

s/ Kelly F. Huedepohl

Kelly F. Huedepohl, OSB No. 133896 503-222-9955 Attorneys for Defendant Patenaude & Felix, A.P.C.

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **DEFENDANT'S UNOPPOSED MOTION**

TO EXTEND TIME IN WHICH TO RESPOND TO PLAINTIFF'S MOTION FOR

ATTORNEYS FEES on the following:

Bret A. Knewtson Law Office of Bret Knewtson 3000 NW Stucki Place, Suite 230-M Hillsboro, OR 97124 Phone: (503) 846-1160 Fax: (503) 922-3181

Of Attorneys for Plaintiff

Mark G. Passannante Broer & Passannante PS 1001 SW Fifth Avenue, Suite 1220 Portland, OR 97204 Phone: (503) 294-0910

Fax: (503) 243-2717 Of Attorneys for Plaintiff

by electronically mailed notice from the court to above said attorneys on said day.

DATED this 23rd day of December, 2015.

KEATING JONES HUGHES, P.C.

s/ Kelly F. Huedepohl

Kelly F. Huedepohl, OSB No. 133896 khuedepohl@keatingjones.com, FAX 503-796-0699 Of Attorneys for Defendant Patenaude & Felix, A.P.C.

Trial Attorney: Peter Eidenberg, OSB No. 075778